





EXHIBIT B

Infringement of U.S. Patent No. 11,253,020 By Veleasha

Veleasha makes, designs, develops, offers for sale, sells for importation within the United States products which infringe at least claims 1, 3, and 5-6 of U.S. Patent No. 11,253,020 (“the ’020 patent”), as set forth below. The chart below provides only an exemplary identification of infringement of claims 1, 3, and 5-6 of the ’020 patent based on facts and information known to date. Images in the chart below are exemplary only, as each accused Infringing Product includes similar if not identical components and instructions identified in the chart below.

Claim	Exemplary Infringing Product
1. An artificial lash extension system comprising:	<p>Veleasha specifically designs each version of its lash extensions with artificial lashes advertised as made of PBT synthetic fibers, including, but not limited to, its Veleasha Lash Clusters Kit Waterproof 144pcs Eyelash Clusters kit D Curl Cluster Lashes Kit Cluster Eyelash Extension Wispy with Lash Bond and seal DIY Eyelash extension at Home (Roe Kit-D-8-16mm) [B0D9QHRJ8T]. The accused Infringing Products have “lash clusters” that satisfy the elements of claim 1, as shown in further detail below. Veleasha advertises its lash clusters and kits as DIY lash extensions to be applied to the natural lashes (and thus are a lash extension system).</p> <div data-bbox="467 1146 797 1461">  </div> <p>Veleasha Lash Clusters Kit Waterproof 144PCS Eyelash Clusters kit D Curl Cluster Lashes Kit Cluster Eyelash Extension Wispy with Lash Bond and Seal DIY Eyelash extension at Home(Rose Kit-D-8-16mm) Visit the Veleasha Store</p> <p>The Amazon DIY Lash Extensions Kit above includes “lash clusters” that are also sold by Veleasha as sets of individual lash clusters and not as part of a kit, as shown and illustrated below.</p> <p>Screen shot from Amazon Veleasha Lash Clusters 144pcs Eyelash Clusters Wispy D Curl Cluster Lashes 8-16MIX Natural Cluster Eyelash Extensions Pestanas False Eyelashes Fluffy DIY Eyelash Extension at Home (D-MIX,8-16mm) [B0D1G1BMLR]:</p>

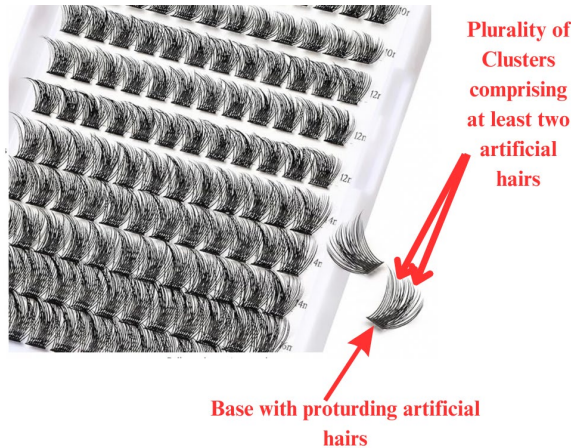
Claim	Exemplary Infringing Product																
	 <p>Veleasha Lash Clusters 144PCS Eyelash Clusters Wispy D Curl Cluster Lashes 8-16MIX Natural Cluster Eyelash Extensions Pestañas False Eyelashes Fluffy DIY Eyelash Extension at Home(D-MIX,8-16mm) Visit the Veleasha Store</p>																
<p>[1a] a plurality of lash extensions designed to attach adjacent to one another at an underside of natural lashes, each of the plurality of lash extensions comprising:</p>	<p>The Veleasha product comprises a plurality of lash extensions designed to attach adjacent to one another at an underside of natural lashes. As shown and described in Amazon listing for the Veleasha Lash Clusters (underlining added): Veleasha</p> <ul style="list-style-type: none">  Easy to Wear: Use a tweezer to pinch the band of cluster eyelashes and <u>apply lash clusters below your natural lashes</u>. The lash band part will not stab your eyelid area when you blink. Bring you a perfect experience during lash application.  <p>VS</p> <table border="1"> <thead> <tr> <th>Veleasha</th> <th>OTHERS</th> </tr> </thead> <tbody> <tr> <td>SOFT</td> <td></td> </tr> <tr> <td>LIGHTWEIGHT</td> <td></td> </tr> <tr> <td>CRUELTY-FREE</td> <td></td> </tr> <tr> <td>REUSABLE</td> <td></td> </tr> <tr> <td>Knot-free & Flat Base</td> <td>Ultra-Thick</td> </tr> <tr> <td>Good Quality</td> <td>Easy To Break</td> </tr> <tr> <td>Feathery Soft & Comfortable</td> <td>Clutter</td> </tr> </tbody> </table> <p>HOW TO APPLY</p> <ol style="list-style-type: none"> Scrape off the extra glue on the bond before use. Brush a little lash bond on your natural eyelashes. Put the false eyelashes under your natural lashes. Use the seal to fix eyelashes. 	Veleasha	OTHERS	SOFT		LIGHTWEIGHT		CRUELTY-FREE		REUSABLE		Knot-free & Flat Base	Ultra-Thick	Good Quality	Easy To Break	Feathery Soft & Comfortable	Clutter
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[1b] a plurality of clusters of artificial hairs, each of the plurality of clusters comprising at least two artificial hairs; and

a base from which the at least two artificial hairs of each of the plurality of clusters protrude,

wherein at least some of the artificial hairs are connected to one another at a respective part of the base by at least an application of heat.

The Veleasha Lash Clusters product comprises a plurality of clusters of artificial hairs, each of the plurality of clusters comprising at least two artificial hairs, and a base from which at least two of the artificial hairs of each of the plurality of clusters protrude (arrows added):



Closeup of base and Clusters:

Base with artificial hair clusters connected to one another at the base through application of heat.



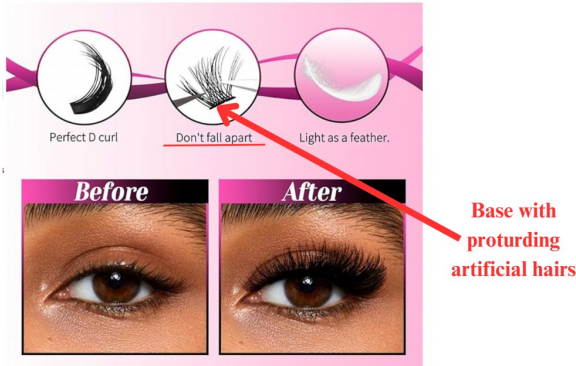
As shown above and below, in its Veleasha Lash Clusters listing explicitly shows and states that its artificial hairs are connected to one another at a respective part of the base by being “Heat Bonded” that “Don’t Fall Apart” (arrows and underlining added):

- 🥰 Great Quality: Our Lashes choose high-quality PBT material and the individual lashes 30D/40D/50D looks real gorgeous results, not plasticky, The curls last long and cluster eyelash are lightweight, heat-bonded technology will not easily fall apart.

Why Choose *Veleasha*®



Base with protruding artificial hairs

	Thus, the DIY Lash Clusters include at least some artificial hairs that are connected to one another at a respective part of the base by at least an application of heat.
Claim	Accused Product
3. The artificial lash extension system of claim 1, wherein the base of each of the plurality of lash extensions is formed by at least the application of heat.	<ul style="list-style-type: none"> Great Quality: Our Lashes choose high-quality PBT material and the individual lashes 30D/40D/50D looks real gorgeous results, not plasticky, The curls last long and cluster eyelash are lightweight, <u>heat-bonded</u> technology will not easily fall apart. <p>Why Choose Veleasha®</p>  <p>As shown above, in its Amazon listing for individual clusters the Veleasha Lash Clusters explicitly shows and states that the lash extensions are “Heat Bonded.”</p> <p>Thus, the Veleasha Cluster Lashes meet the limitation that the base of each of the plurality of lash extensions is formed by at least an application of heat.</p>
Claim	Accused Product
5. The artificial lash extension system of claim 1, wherein the at least two artificial hairs comprise a synthetic material.	<p>Screen shot from the Veleasha Cluster Lashes key attributes, the lash material is “PBT” which is a synthetic material (underlining added):</p> <ul style="list-style-type: none"> Great Quality: Our Lashes choose high-quality <u>PBT material</u> and the individual lashes 30D/40D/50D looks real gorgeous results, not plasticky, The curls last long and cluster eyelash are lightweight, heat-bonded technology will not easily fall apart.
Claim	Accused Product
6. The artificial lash extension system of claim 5,	See screen shot from the Amazon Veleasha Cluster Lashes listing describes the material as “PBT” for claim 5, where the lash material is identified as PBT fiber.

wherein the at least two artificial hairs comprise polybutylene terephthalate (PBT).	<ul style="list-style-type: none">• 😊 Great Quality:Our Lashes choose high-quality <u>PBT material</u> and the individual lashes 30D/40D/50D looks real gorgeous results, not plasticky, The curls last long and cluster eyelash are lightweight, heat-bonded technology will not easily fall apart.
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